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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada
corporation,

Plaintiff,

v.

SHELDON ADELSON, et al.,

Defendants.

AND RELATED COUNTERCLAIM

Case No. 2:19-CV-01667-ART-VCF

**STIPULATION AND ORDER
REGARDING SEALING OPPOSITION TO
COUNTERDEFENDANT GREENSPUN
MEDIA GROUP, LLC'S MOTION FOR A
PROTECTIVE ORDER REGARDING
DEFENDANTS' FRCP 30(b)(6)
DEPOSITION [ECF NO. 693]**

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
 2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through
 3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,
 4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
 5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and
 6 INTERFACE OPERATIONS LLC DBA ADFAM (collectively “Defendants”), by and through
 7 their counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone, Esq., hereby
 8 stipulate and agree as follows:

9 1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer
 10 prior to filing any additional motions to seal. ECF No. 619. The parties’ met-and-conferred on
 11 June 10, 2022, regarding sealing relating to the Opposition to Counterdefendant Greenspun Media
 12 Group, LLC’s Motion for a Protective Order Regarding Defendants’ FRCP 30(b)(6) Deposition
 13 [ECF No. 693]. Matthew Tsai, Esq., on behalf of the Sun, and Mona Kaveh, Esq., on behalf of
 14 Defendants, engaged in a meet and confer.

15 2. The parties agree that the following, and any references thereto in the Opposition,
 16 are appropriate for sealing:

- 17 • **Exhibit J:** Text message exchanges between Bob Cauthorn and Brian Greenspun,
 18 which the Sun has marked as “Attorneys’ Eyes Only” pursuant to the parties’
 19 Protective Order.
- 20 • **Exhibit K:** Excerpts of the transcript of the deposition of Jason Taylor, taken on
 21 May 12, 2022. Mr. Taylor’s deposition transcript is temporarily designated as
 22 “Confidential” in its entirety pursuant to the parties’ Protective Order, and the
 23 parties have until 30 days after receipt of the deposition transcript to confirm what
 24 portions, if any, should remain “Confidential” or “Attorney’s Eyes Only.” ECF No.
 25 87 ¶ 7(a). Given that the 30-day deadline has not run, the entirety of this exhibit is
 26 provisionally filed under seal.

- **Exhibit N:** The Sun's Balance Sheet, as of June 30, 2021 (SUN_00068228), which the Sun has marked as "Attorneys' Eyes Only" pursuant to the parties' Protective Order. This exhibit contains sensitive financial information.

DATED this 10th day of June, 2022.

DATED this 10th day of June, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

KEMP JONES LLP

By: /s/ Kristen Martini

By: /s/ Mona Kaveh

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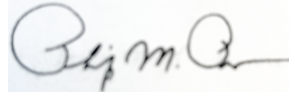
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IT IS SO ORDERED:



SPECIAL MASTER

DATED: June 13, 2022